

**IN THE CIRCUIT COURT OF ST. CLAIR COUNTY, ILLINOIS
TWENTIETH JUDICIAL CIRCUIT COURT
STATE OF ILLINOIS**

EDDIE HOBSON,

Plaintiff,

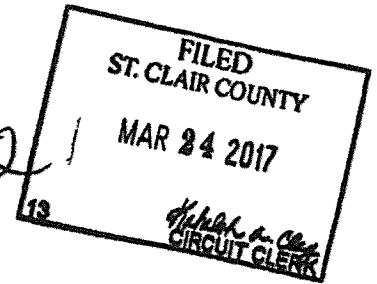
v.

SAVE-A-LOT FOOD STORES, LTD.
d/b/a SAVE-A-LOT STORE #412,

Serve: CT Corporation System
120 South Central Ave.
Clayton, MO 63105

Defendant.

Case No: 17L1521



JURY TRIAL DEMANDED

COMPLAINT

COMES NOW Plaintiff, Eddie Hobson, by and through his undersigned counsel, and for his cause of action against Defendant Save-A-Lot Food Stores, ltd. d/b/a Save-A-Lot Store #412, states as follows:

1. Plaintiff Eddie Hobson is a resident of St. Clair County, IL.
2. Defendant Save-A-Lot. is foreign corporation doing business and in good standing in Illinois, which can be served with process on their registered agent at the address referenced above. Defendant Save-A-Lot Food Stores, Ltd. does business as Save-A-Lot Store #412.
3. On or about September 20, 2015, Plaintiff was an invitee to Save-A-Lot #412 located at 2600 State St. East St. Louis, IL 62205. While walking down an aisle inside the store, Plaintiff slipped on standing water in font of store freezers. The spill caused Plaintiff to slip and injure herself.

4. The standing water on the floor was a dangerous condition of Defendant's premises. As a result, the premises of Defendant were not reasonably safe.

5. Prior to encountering the dangerous condition, Plaintiff was not aware of the dangerous condition. She did not see it before she slipped.

6. Defendant, through its agents and employees, knew or through the exercise of ordinary care, could have known of this dangerous condition.

7. Defendant should keep the floors of its store safe and free from slick liquids.

8. Venue is proper in this court pursuant to 735 ILCS 5/2-101.

9. Plaintiff's fall and injuries were a direct and proximate result of the negligence and carelessness of Defendant Save-A-Lot Food Stores, Ltd., d/b/a Save-A-Lot Store #412 in one or more of the following respects:

- a. failure to make the floors of its store reasonably safe;
- b. failure to warn of the dangerous condition created by the standing water;
- c. failure to regularly inspect its floors for spills;
- d. failure to remove or wipe up the water; and
- e. failure to exercise reasonable care to protect guests – including Plaintiff – from the standing water.

10. As a direct and proximate result of Defendant's negligence, Plaintiff was injured and suffered damages. These include injuries to Plaintiff's hip, knees, and upper body, and a dislocated collar bone and right shoulder. Plaintiff suffered pain in the past and will do so in the future. Plaintiff has suffered wage loss in the past and will do so in the future.

11. These also include damages for medical bills and costs relating to medical treatment for her injuries in the past and in the future.

WHEREFORE, Plaintiff Eddie Hobson respectfully requests judgment against Defendant Save-A-Lot Food Stores, Ltd., d/b/a Save-A-Lot Store #412 for her damages in the amount greater than the \$50,000 jurisdictional minimum of this Court, and for any further just and proper relief.

Respectfully submitted,

BURGER LAW

A handwritten signature in black ink, appearing to read 'G. Burger', is written over a horizontal line.

Gary K. Burger, #6212156
500 N. Broadway Ste 1350
St. Louis, MO 63102
(314) 542-2222 (phone)
(314) 588-9402 (fax)
gary@burgerlaw.com